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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

January 25, 1996

Jim Whitfield, Forest Trail Planner
Sequoia National Forest
900 W. Grand Avenue
Porterville CA 93257

Dear Mr. Whitfield:

The US Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **SEQUOIA NATIONAL FOREST TRAIL PLAN, Fresno, Kern & Tulare Counties, California**. Our comments, provided pursuant to the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality's Regulations for Implementing NEPA, have been delayed due to the federal furlough of December 18, 1995 through January 5, 1996. However, I understand from Laura Fujii of my staff that your office agreed to accept EPA's comments through the end of January.

The DEIS assesses six alternatives (including No Action) to manage and develop the Sequoia National Forest's trail system. The Trail Plan is considered as an amendment to the National Forest's Land and Resource Management Plan. The preferred alternative (Alternative 6) is a blend of Alternatives 4 and 5. Alternative 4 emphasizes improved quality in the trail system, while Alternative 5 emphasizes shared use of the trail system. Under the preferred alternative, 220 and 250 miles of new non-motorized and motorized trails, respectively, would be established.

We have rated the DEIS as **EC-2 - Environmental Concerns - Insufficient Information**. Please refer to the attached "Summary of Rating Definitions and Follow-Up Action" for a more detailed explanation of EPA's rating system. Our rating reflects the need for additional information and analysis concerning existing water quality of the eight major river basins within the Sequoia National Forest and the project's specific impacts to water quality in these eight watersheds.

We note on page 82 that, except for Alternative 3, the preferred alternative has the greatest potential for impacts to watersheds, soil resources and fisheries, including the greatest impact associated with the construction of new roads and trails. However, the reader cannot readily gauge the relative degree of existing water quality problems within the eight major watersheds that would be affected by the proposed Trail Plan. This limits a

true comparative evaluation of the alternatives. The Final Environmental Impact Statement (FEIS) should contain sufficient information on existing water quality for each alternative "so that all reviewers may evaluate their comparative merits." [40 CFR 1502.14(b)]. Likewise, only stating that the "cumulative effects of past, current, and foreseeable management activities ...will be analyzed at the project level, before any decisions are made..." (p. 50), does not provide enough information for comparative purposes.

Under the Clean Water Act, projects which involve clearing, grading and/or excavation, and result in land disturbances of five or more acres, require stormwater discharge permits. Stormwater discharges from construction activities disturbing less than five acres, but which are part of a larger common plan or development, also need such permits. For these reasons, it is important that the Forest Service quantify the land disturbance anticipated for each of the alternatives. This information should be contained in the FEIS. In addition, CWA Section 313 requires landowners (including Federal agencies) to develop and implement stormwater pollution prevention plans whenever stormwater discharge permits are required. We recommend that the Forest Service contact the Regional Water Quality Control Board for specific permitting requirements. Should permits be necessary, it would be helpful to include your pollution prevention plans, perhaps as an appendix to the FEIS.

Lastly, we appreciate the inclusion of Best Management Practices (BMPs) and view such BMPs as a vital project feature. We recommend that the Record of Decision (ROD) contain a commitment to implement BMPs and other relevant water quality requirements such as those in the Stormwater Pollution Prevention Plan, should one be required.

We appreciate the opportunity to comment on the DEIS. Please send one copy of the FEIS/ROD to my attention (code: E-3) at the letterhead address when it is filed with EPA's Washington, D.C. office. If you have any questions, please call me at 415-744-1584 or David Tomsovic of my staff at 415-744-1569.

Sincerely,



David Farrel, Chief
Office of Federal Activities

Enclosure: 1

M.I. #1506

